

May 10, 2016

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**SECRETARY, BOARD OF
OIL, GAS & MINING**

Board of Oil, Gas and Mining
c/o Division of Oil, Gas and Mining
PO Box 145801
Salt Lake City, Utah 84114

Dear Members of the Board:

We are greatly appreciative of all that Axia is doing to develop resources in Utah, particularly during this challenging time.

However, we have concerns about the large spacing requirement requested by Axia, which may establish a precedent that in the long run will not be beneficial to Utah Royalty owners or the oil industry.

Therefore, we would request that the Board consider alternatives to the large spacing requirement requested that could both benefit Axia as well as protect Utah royalty owners.

Thank you for all you do to promote a thriving natural resources industry in Utah.

Respectfully submitted,

/s/ Craig E. Peterson

President

NARO Rockies, a subsidiary of National Association of Royalty Owners

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Salt Lake City, UT 84108-2860